

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Lawrence Little v. Ije Ekweani, et al.

Little v. Ekweani, Civil No. 1:26-cv-00863-JRR (D. Md. May 1, 2026) · No. 1:26-cv-00863-JRR · Decided May 1, 2026

SUMMARY

The United States District Court for the District of Maryland denied Lawrence Little’s emergency motion for a temporary restraining order and preliminary injunction seeking emergency housing assistance. The court held that Plaintiff had not complied with Federal Rule of Civil Procedure 65’s notice and certification requirements and had not shown imminent irreparable harm, in part because the alleged homelessness had persisted for approximately three years.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Julie R. Rubin
JURISDICTION	United States District Court for the District of Maryland
DECIDED	May 1, 2026
DOCKET	1:26-cv-00863-JRR
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for a temporary restraining order and preliminary injunction before Defendants had been served. The court denied the motion without a hearing.
STANDARD OF REVIEW	A party seeking a temporary restraining order or preliminary injunction must clearly show a likelihood of success on the merits, irreparable harm absent relief, a balance of equities favoring relief, and that an injunction is in the public interest. A TRO without notice additionally requires compliance with Federal Rule of Civil Procedure 65(b)(1).
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Lawrence Little v. Ije Ekweani, et al.

TOPICS

- injunctions
- civil procedure
- eviction
- landlord tenant

PRACTICE AREAS

civil procedure

injunctive relief

landlord-tenant

civil rights

QUESTIONS PRESENTED

1. Whether Plaintiff could obtain a temporary restraining order or preliminary injunction without serving Defendants or providing the written certification required by Federal Rule of Civil Procedure 65.
2. Whether Plaintiff clearly demonstrated immediate and irreparable harm sufficient to support preliminary injunctive relief.

HOLDINGS

1. The motion for a temporary restraining order or preliminary injunction was properly denied because Plaintiff had not served Defendants and had not provided a written certification detailing his efforts to provide notice or why notice should not be required.
2. Plaintiff failed to demonstrate the immediate and irreparable harm necessary to support a TRO or preliminary injunction.

KEY QUOTATIONS

“As a TRO is “an extraordinary remedy,” it “may only be awarded upon a clear showing that the plaintiff is entitled to such relief.”” (Section II)

“Where there is a failure to comply with the requirements of the rule, the motion for a TRO must be denied.” (Section III)

FACTUAL BACKGROUND

Plaintiff alleged that Defendants' actions caused his wrongful eviction from Baltimore City public housing at 210 Douglass Court in Baltimore, Maryland. He asserted that he had been homeless for approximately three years and was currently living in a shelter. He sought emergency housing assistance through a temporary restraining order and preliminary injunction.

PROCEDURAL HISTORY

Plaintiff initiated the action on March 2, 2026, alleging claims arising from his purported wrongful eviction from Baltimore City public housing and asserting constitutional and state-law claims. The court later granted in forma pauperis status and instructed Plaintiff to complete United States Marshal Service forms for service, but Defendants had not yet been served when Plaintiff filed his emergency motion. The court denied the motion because Plaintiff failed to comply with Federal Rule of Civil Procedure 65's notice and certification requirements and failed to clearly demonstrate imminent irreparable harm.

DISPOSITION

other

CASES CITED

- *Maages Auditorium v. Prince George's Cnty.*, 4 F. Supp. 3d 752, 760 n.1 (D. Md. 2014), *aff'd*, 681 F. App'x 256 (4th Cir. 2017)
- *Frazier v. Prince George's Cnty.*, 86 F.4th 537, 543 (4th Cir. 2023)
- *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 20, 22 (2008)
- *Sci. Sys. & Applications, Inc. v. United States*, PWG-14-2212, 2014 WL 3672908, at *3 (D. Md. July 22, 2014)
- *Lee v. Meyers*, ELH-21-1589, 2021 WL 4804018, at *3 (D. Md. Oct. 14, 2021)
- *Candle Factory, Inc. v. Trade Assocs. Grp., Ltd.*, 23 F. App'x 134, 137–38 (4th Cir. 2001)
- *Quince Orchard Valley Citizens Ass'n, Inc. v. Model*, 872 F.2d 75, 80 (4th Cir. 1989)
- *Mountain Valley Pipeline, LLC v. 6.56 Acres of Land, Owned by Sandra Townes Powell*, 915 F.3d 197, 216 (4th Cir. 2019)
- *Direx Israel, Ltd. v. Breakthrough Med. Corp.*, 952 F.2d 802, 812 (4th Cir. 1991)

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